

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROWENA WARD individually, and on behalf of the Estate of RORY WARD JR., and RORY WARD SR, individually,
Plaintiffs,

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CIVIL ACTION NO. 4:23-cv-1708

V.

HARRIS COUNTY, TEXAS, et al., §
Defendants. §

**NOTICE RE DEFENDANT DONNA REID’S REPLY TO PLAINTIFFS’
RESPONSE TO HER AMENDED MOTION TO DISMISS**

TO THE HONORABLE JUDGE ESKRIDGE:

Defendant Donna Reid joined her reply in support of her amended motion with the reply of nurses Tamica Thomas and Ayo Sirleaf DE 84 filed on January 9, 2025.

Date: January 16, 2025.

Respectfully submitted,

CHRISTIAN D. MENEFEE

HARRIS COUNTY ATTORNEY

JONATHAN G. C. FOMBONNE

DEPUTY COUNTY ATTORNEY AND FIRST ASSISTANT

NATALIE G. DELUCA

MANAGING COUNSEL,
DEFENSIVE LITIGATION, EMPLOYMENT, &
REAL ESTATE DIVISIONS

Respectfully submitted,

By: /s/ James C. Butt

JAMES C. BUTT

Sr. Assistant County Attorney

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ATTORNEY**

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ATTORNEYS FOR DEFENDANTS

REID, THOMAS AND SIRLEAF

CERTIFICATE OF WORD COUNT

I, James C. Butt, certify Defendant Donna Reid's notice complies with Local Rule 7.1(f).

I further certify that, in preparation of this Notice, I used Word for Microsoft Office 365 Version 2108, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above-referenced Notice contains 328 words.

/s/ Jim Butt

CERTIFICATE OF SERVICE

I certify that, pursuant to the Federal Rules of Civil Procedure, a true copy of the instrument to which this certificate is attached is filed with the clerk of the court using CM/ECF system, which will send electronic notification for those of record.

/s/ Jim Butt
Jim Butt